

REMARKS

Claims 1 – 20 are pending in the application. Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2002/0055853 to Macleod et al. in view of U.S. Patent No. 6,341,310 issued to Leshem et al. Applicant respectfully traverses. Applicant respectfully requests that the Examiner withdraw the rejections and allow all pending claims.

The Examiner maintains an objection to the specification. Applicants respectfully submit that the previous amendment to the specification has adequately referred to the elements recited by the claims so that one of skill in the art can fully understand the claims. Accordingly, Applicant respectfully requests that the Examiner withdraw the objection to the specification.

The Examiner maintains the rejections based on Macleod/Leshem by stating “Macleod teaches the storage of meta-data associated with each customer product based interaction.” Applicants respectfully traverse. The Examiner apparently relies upon the reference to business rules in paragraph [0157] of Macleod, one example of which is a dialog about a “product.” Macleod’s reference to a “product” thread or string addresses a logical link 207 that cross-references section 191, which contains text versions of interactions, with section 189, which contains multimedia interactions. Sections 189 and 191 address “issues” raised by a customer, thus paragraph [0157] narrowly addresses storing product information related to a customer. The limited nature of Macleod’s analysis is illustrated by the example presented starting at paragraph [0163]. As set forth in paragraph [0164], data is mined from repository 187 to enhance service to a customer. Nothing in Macleod provides the expansive disclosure suggested by the Examiner, or the proposed combination with Leshem.

Even should the Examiner maintain the rejection over Applicant’s argument above, Applicant respectfully submits that the Examiner should withdraw the rejection under Section 103 because no motivation exists to combine Macleod and Leshem as is suggested by the Examiner. Each of Claims 1 and 11 recites the use of plural contact mediums. Applicant respectfully submits that no motivation exists to combine Macleod and Leshem so that a directed graph is used to track communications about a product across plural mediums. Leshem references only the tracking of URL links through a Web site by

crawling through the Web site and does not track actual user interactions with the Web site. since Leshem does not relate to analysis of actual communications, no motivation exists to combine Leshem as the Examiner has done. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejections and allow Claims 1 and 11, as well as Claims 2-10 and 12-20 which depend respectively from Claims 1 and 11.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the examiner is requested to telephone the undersigned at (512) 338-9100.

The Commissioner is authorized to deduct any additional fees which may be necessary and to credit any overpayment to Deposit Account No. 502264.

CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence is being electronically submitted to the COMMISSIONER FOR PATENTS via EFS on April 16, 2009.

/Robert W. Holland/

Respectfully submitted,

/Robert W. Holland/

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